

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

DOMINIQUE ALEXANDER,  
CARVELL BOWENS, CYRUS  
CEZAR, DAMON CRENSHAW,  
DAJAI FIELDS, CYNTHIA FLORES,  
TRACY FOSTER, JASMIN  
GALVAN, DEBBIE KIM, ALEXIS  
MCKINNEY, LAPREA PIERCE,  
AMY SMITH, LAKEISHA SMITH,  
NATHAN TINDALL, ELISEO  
VALDEZ, COURTNEY WADLOW,  
CNAYA WARREN, JANE AND  
JOHN DOE BRIDGE PLAINTIFFS 1-  
10

Plaintiffs,

VS.

CITY OF DALLAS, TEXAS; EDGARDO GARCIA; ULYSHA RENEE HALL; JOHN AND JANE ROE DALLAS POLICE OFFICERS 1-10; DALLAS COUNTY, TEXAS; MARIAN BROWN; JOHN AND JANE SMITH SHERIFF'S DEPUTIES 1-10; STATE OF TEXAS; TEXAS DEPARTMENT OF PUBLIC SAFETY; STEVEN C. MCCRAW; JOHN AND JANE WHITE, STATE TROOPERS 1-10, FEDERAL BUREAU OF INVESTIGATION, DEPARTMENT OF HOMELAND SECURITY, BUREAU OF ALCOHOL, TOBACCO, FIREARMS, AND EXPLOSIVES, UNITED STATES NATIONAL GUARD; JOHN AND JANE BLACK FEDERAL AGENTS 1-10

Defendants.

CIVIL CAUSE NO.  
3:22-cv-1193

## JURY TRIAL DEMANDED

## PLAINTIFFS' ORIGINAL COMPLAINT

COME NOW, Dominique Alexander, Carvell Bowens, Cyrus Cezar, Damon Crenshaw,

Dajai Fields, Cynthia Flores, Tracy Foster, Jasmin Galvan, Debbie Kim, Alexis McKinney, Laprea Pierce, Amy Smith, Lakeisha Smith, Nathan Tindall, Eliseo Valdez, Courtney Wadlow, Cnaya Warren, and Jane and John Doe Bridge Plaintiffs 1-10 (collectively, “Plaintiffs”) and bring this civil action against: The City of Dallas, Texas; City of Dallas Police Chief Edgardo “Eddie” Garcia (“Chief Garcia”) in his individual and official capacities; City of Dallas Former Police Chief Ulysha Reneé Hall (“Chief Hall”) in her individual and official capacities; and City of Dallas John and Jane Roe Police Officers 1–10 in their individual and official capacities (the “DPD Officer Defendants,” and together with the City of Dallas, Chief Garcia, and Chief Hall, the “City of Dallas Defendants”); Dallas County, Texas; Dallas County Sheriff Marian Brown (“Sheriff Brown”), in her individual and official capacities; Dallas County John and Jane Smith Sheriff’s Deputies 1-10 in their individual and official capacities (the “Sheriff Deputy Defendants,” and together with Dallas County, Sheriff Brown, the “Dallas County Defendants”); and The State of Texas; the Texas Department of Public Safety (“DPS”); DPS Director Steven C. McCraw in his individual and official capacities; and John and Jane White State Troopers 1-10 in their individual and official capacities (the “State Trooper Defendants,” and together with the State of Texas, DPS, and DPS Director Steven C. McCraw, the “State of Texas Defendants”), the Federal Bureau of Investigation, Department Of Homeland Security, Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States National Guard; John and Jane Black Federal Agents 1-10 in their individual and official capacities (“Federal Defendants”) and for cause would show the Court the following:

## **I. INTRODUCTION**

1. In the wake of the brutal and unjustified May 25, 2020 killing of George Floyd by police officers in Minneapolis, Minnesota, hundreds of thousands of Americans took to

public streets and forums to protest police brutality and racial inequality. Dallas was no exception, with peaceful protests occurring across the city, beginning on May 29, 2020, and continuing throughout the remainder of 2020 (the “2020 Protests”). Undeterred by the fact that police officers’ use of excessive force was the very subject of the demonstrations and protests, City of Dallas Police Department (“DPD”) officers repeatedly used extreme and unconstitutional methods, and lethal force against these crowds, targeting peaceful, non-threatening protesters and bystanders with tear gas, smoke bombs, flash-bangs, pepper balls, mace, and what are known as “kinetic impact projectiles,” or “KIPs.” Upon information and belief, deputies from the Dallas County Sheriff’s Department (“Sheriff’s Department”) and troopers from the Texas Department of Public Safety (“DPS”) also engaged in similar conduct against protesters and bystanders in coordination with and/or at the direction of the City of Dallas Defendants. Officers also unlawfully detained, seized, tear-gassed and smoke-bombed protesters simply because they exercised their First Amendment rights.

2. Dominique Alexander, Carvell Bowens, Cyrus Cezar, Damon Crenshaw, Dajai Fields, Cynthia Flores, Tracy Foster, Jasmin Galvan, Debbie Kim, Alexis Mckinney, Laprea Pierce, Amy Smith, Lakeisha Smith, Nathan Tindall, Eliseo Valdez, Courtney Wadlow, Cnaya Warren, and Jane and John Doe Bridge Plaintiffs 1-10 (collectively “Plaintiffs”) peaceably attempted to exercise their First Amendment rights by participating in the 2020 Protests in Dallas, Texas on June 1, 2020. However, on that day, Plaintiffs became victims of the very same unjustified police brutality which the ongoing 2020 Protests opposed. Specifically, Plaintiffs were unlawfully detained on Margaret Hunt Bridge in violation of their constitutional rights and were harmed when DPD Officer Defendants, Sheriff Deputy Defendants, and/or State Trooper Defendants, and/or Federal Agent Defendants fired tear gas canisters at them, shot

them with rubber bullet KIP's, and seized and restrained them for hours ("Bridge Incident").

3. This is a civil action for relief for violations of Plaintiffs' civil rights and harm they sustained as a result of the acts and omissions by Defendants. Defendants, both individually and collectively, were responsible for the excessive use of force against Plaintiffs and their resulting physical injuries, and for violating Plaintiffs' constitutional rights under the First, Fourth, and Fourteenth Amendments to the U.S. Constitution. These injuries are the direct result of official policies of the respective city and county law enforcement agencies, the State of Texas, U.S. Federal Agencies, and failures by the same and their current and former leadership to implement and enforce policies and standards that ensure their officers, deputies, and troopers know and are trained in the constitutional limits of force against civilians, particularly those exercising their First Amendment rights.

## **II. PARTIES**

4. Plaintiff Dominique Alexander is an individual resident of the Northern District of Texas and can be served through the undersigned counsel of record.

5. Plaintiff Carven Bowens is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

6. Plaintiff Cyrus Cezar is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

7. Plaintiff Damon Crenshaw is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

8. Plaintiff Cynthia Flores is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

9. Plaintiff Tracy Foster is an individual resident in the Northern District of Texas

and can be served through the undersigned counsel of record.

10. Jasmin Galvan is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

11. Debbie Kim is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

12. Alexis Mckinney is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

13. Laprea Pierce is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

14. Amy Smith is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

15. Lakeisha Smith is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

16. Nathan Tindall is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

17. Eliseo Valdez is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

18. Courtney Wadlow is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

19. Cnaya Warren is an individual resident in the Northern District of Texas and can be served through the undersigned counsel of record.

20. Jane and John Doe Bridge Plaintiffs 1-10 are individual residents in the Northern District of Texas who were participated in the "Bridge Incident" and can be served through the

undersigned counsel of record.

21. Defendant the City of Dallas, Texas is a political subdivision of the State of Texas and funds, operates, and controls DPD. The City of Dallas, along with the Dallas City Council, Chief Garcia, and Former Chief Hall, are (or were) responsible for implementing DPD's budget, policies, procedures, practices, and customs, and for the acts and omissions challenged by this suit. DPD under the direction of the Dallas City Council, Chief Garcia, and Former Chief Hall, is also responsible for preventive, investigative, and enforcement services for all citizens of the City of Dallas. Defendant the City of Dallas may be served with process by serving the Dallas City Attorney, Christopher J. Caso, at 1500 Marilla Street, Room 7DN, Dallas, Texas; Phone (214) 670-3519 or Fax: (214) 670-3519.

22. Defendant Chief Edgardo "Eddie" Garcia is the Chief of Police of DPD and a final policymaker for DPD, with the authority for setting policies, including training of DPD Officers. Chief Garcia may be served with process by serving the Dallas City Attorney, Christopher J. Caso, at 1500 Marilla Street, Room 7DN, Dallas, Texas; Phone (214) 670-3519 or Fax: (214) 670-3519.

23. Between 2017 and 2020, Defendant Former Chief Ulysha "Renee" Hall was the Chief of Police of DPD and a final policymaker for DPD, with the authority for setting policies, including training of DPD Officers. *See Garza v. City of Donna*, 922 F.3d 626, 637 (5th Cir. 2019) (the Fifth Circuit "[has] previously found that Texas police chiefs are final policymakers for their municipalities."). Chief Hall was also the supervisor for the DPD Officer Defendants at all times relevant in this complaint. Upon information and belief, Chief Hall is a resident of Maryland and may be served with process wherever she may be found.

24. Defendants John and Jane Roe Officers 1-10 are certain individuals whose

identities are presently unknown to Plaintiffs but who, upon information and belief, were at all relevant times DPD Officers and were acting in such capacity. Defendants John and Jane Roe 1-10 are responsible for the acts and omissions challenged by this lawsuit. Plaintiffs will amend this complaint to substitute the true names and capacities of the Defendants John and Jane Roe 1-10 when ascertained during this litigation.

25. Defendant Dallas County, Texas is a political subdivision of the State of Texas, and funds, operates, and controls the Dallas County Sheriff's Department. Dallas County, along with Sheriff Brown, is responsible for implementing the Sheriff's Department's budget, policies, procedures, practices, and customs, and for the acts and omissions challenged by this suit. The Sheriff's Department, under the direction of Dallas County and Sheriff Brown, is also responsible for preventive, investigative, and enforcement services for all citizens of Dallas County. Dallas County may be served with process the Dallas County Sheriff's Department at 133 N. Riverfront Blvd., LB-31, Dallas, TX 75207.

26. Defendant Sheriff Brown is the Dallas County Sheriff and a final policymaker for the Sheriff's Department, with the authority for setting policies, including training of the Sheriff's Deputies. *See Bennett v. Pippin*, 74 F.3d 578, 586 (5th Cir. 1996) (“[i]t has long been recognized that, in Texas, the county sheriff is the county’s final policymaker in the area of law enforcement,[.]” (quoting *Turner v. Upton County, Tex.*, 915 F.2d 133, 136 (5th Cir. 1990), *reh’g denied*, 967 F.2d 181 (5th Cir. 1992))). Sheriff Brown may be served with process by serving County Judge Clay Jenkins, 411 Elm Street, # 200, Dallas, Texas 75202; Phone (214) 653-7949.

27. Defendants John and Jane Smith 1-10 are certain individuals whose identities are presently unknown to Plaintiffs but who, upon information and belief, were at all relevant times Sheriff's Deputies and were acting in such capacity. Defendants John and Jane Smith 1-

10 are responsible for the acts and omissions challenged by this lawsuit. Plaintiffs will amend this complaint to substitute the true names and capacities of the Defendants John and Jane Smith 1-10 when ascertained during this litigation.

28. Defendant the State of Texas can be served at the Office of the Attorney General, 300 West 15th Street, Austin, Texas 78701; or by mail to: P.O. Box 12548, Austin, Texas 78711.

29. Defendant Texas Department of Public Safety (“DPS”) is a state agency organized under the laws of the State of Texas. DPS is responsible for promulgating and implementing policies and procedures that govern the conduct of State Troopers, and to train and supervise State Troopers in the implementation of those policies. It may be served through its Director, Steven C. McCraw, at 5805 North Lamar Boulevard, PO Box 4087, Austin, Texas.

30. Defendant Steven C. McCraw is the Director of DPS and oversees the operations and functions of DPS, including but not limited to, DPS’s budget, policies, procedures, practices, and customs, as well as the acts and omissions challenged by this suit. Director McCraw is sued in his official capacity and may be served at 5805 North Lamar Boulevard, PO Box 4087, Austin, Texas.

31. Defendants John and Jane White State Troopers 1-10 are certain individuals whose identities are presently unknown to Plaintiffs but who, upon information and belief, were at all relevant times State Troopers and were acting in such capacity. Defendants John and Jane White State Troopers 1-10 are responsible for the acts and omissions challenged by this lawsuit. Plaintiffs will amend this complaint to substitute the true names and capacities of the Defendants John and Jane White State Troopers 1- 10 when ascertained during this litigation.

32. Defendant Federal Bureau of Investigation (“FBI”) is the principal federal law



enforcement of the United States and may be served wherever it may be found

33. Department of Homeland Security (“DHS”) is a federal agency charged improving the security of the United States and may be served wherever it may be found.

34. Defendant Bureau of Alcohol, Tobacco, Firearms, And Explosives (“ATF”) is an agency of the United States and may be served wherever it may be found.

35. Defendant United States National Guard is an agency of the United States and may be served wherever it may be found.

36. Defendants John and Jane Black Federal Agents 1-10 are certain individuals whose identities are presently unknown to Plaintiffs but who, upon information and belief, were at all relevant times federal employees and were acting in such capacity. Defendants John and Jane Black Federal Agents 1-10 are responsible for the acts and omissions challenged by this lawsuit. Plaintiffs will amend this complaint to substitute the true names and capacities of the Defendants John and Jane Black Federal Agents 1-10 when ascertained during this litigation.

### **III. JURISDICTION**

37. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

38. Federal jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1331 and 42 U.S.C. § 1983.

39. The Court has general personal jurisdiction over the City of Dallas Defendants and the Dallas County Defendants by virtue of their citizenship and residence in Dallas County, Texas, as well as their continuous and systematic contacts with the State of Texas. Defendant the City of Dallas is a municipality incorporated in the State of Texas. Defendant Dallas County is a county in the State of Texas. Upon information and belief, the DPD Officer Defendants and Sheriff’s Deputy Defendants are residents of the State of Texas.

40. The Court has general personal jurisdiction over the State of Texas Defendants by virtue of their citizenship and residence in the State of Texas, as well as their continuous and systematic contacts with the State of Texas.

41. Furthermore, the Court has specific personal jurisdiction over the City of Dallas Defendants, the Dallas County Defendants, the State of Texas Defendants, and Chief Hall because Plaintiffs' claims against them arise out of or relate to a contact between them and the State of Texas. The DPD Officer Defendants, Sheriff Deputy Defendants, and the State Trooper Defendants used excessive force against Plaintiffs during protests in Dallas, Texas, acting on orders and policies promulgated by Chief Hall and City of Dallas policymakers. Plaintiffs' claims against the City of Dallas Defendants, the Dallas County Defendants, the State of Texas Defendants and Chief Hall arise from that occurrence and Defendants' contact in the state of Texas.

#### **IV. VENUE**

42. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

43. Venue in the Northern District of Texas-Dallas Division is proper pursuant to 28 U.S.C. § 1391 and 28 U.S.C. § 1367 as the incidents that give rise to this Complaint occurred in Dallas, Texas, within the Northern District of Texas.

#### **V. CONDITIONS PRECEDENT**

44. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

45. All conditions precedent have occurred or have been performed. *See* Fed. R. Civ. P. 9(c).

## **VI. STATEMENT OF FACTS**

### **1. The 2020 Protests in Dallas, Texas.**

27. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

28. On Monday, May 25, 2020, an unarmed Black man named George Floyd was murdered by an officer of the Minneapolis Police Department. The events of Mr. Floyd's arrest and murder were captured on video by multiple bystanders as well as individual officers' body cameras. Peaceful protests and demonstrations soon followed through the United States, including in Dallas, Texas.

29. Undeterred by the fact that excessive police force was the very subject of these nationwide demonstrations, videos, photos, and reports of police brutality on massive scales at these protests arose in the weeks immediately following Mr. Floyd's death. Here in Dallas, DPD Officers, Sheriff's Deputies, and State Troopers repeatedly used extreme and lethal force against these crowds during the 2020 Protests, targeting peaceful, non-threatening protesters with tear gas, smoke bombs, flash-bangs, pepper balls, mace, and ammunition that are known as "kinetic impact projectiles," or "KIPs."

30. KIPs, which include so-called "rubber bullets" or "sponge bullets," are often used by American police forces to control crowds. The manufacturers, distributors, and sellers of these projectiles—and the police departments that use them against their own citizens—praise these bullets as being "nonlethal" or "less lethal." They are not. In fact, the fatality, morbidity, and significant risks of injuries from KIPs have been well documented, and KIPs kill approximately three percent of all people they strike. Regardless, in cities across the

country, including Dallas, police departments attempted to quell participation in the 2020 Protests by firing KIPs into crowds, even though five decades of evidence shows such weapons can disable, disfigure, and even kill.

31. In addition to pepper balls, KIPs, and tear gas, law enforcement agencies around the country, including DPD, have used an increasingly violent technique referred to as “kettling,” wherein police officers block off streets and push or “corral” a group of protesters into a small area, like a bridge or city block, to restrict their movement. Thereafter, the police officers move in on the protesters to detain the individuals, arrest the individuals, or allow them to leave through an exit controlled by police.<sup>6</sup> In several instances, officers have held the protesters for hours without food, water or access to restrooms, and unnecessarily used tear gas, smoke bombs, rubber bullets, or other tactics against the kettled individuals in an attempt to “control” or “subdue” the crowd.

32. Also, known as “trap and detain,” this highly controversial technique routinely results in increased tensions between police and protesters who have been trapped in a small area. Originally developed as a military tactic, kettling was initially deployed by military forces in combat to subdue their opponent on the battlefield. Today, however, police departments use this same tactic against protesters, who in many cases are peacefully exercising their constitutional rights.

33. Moreover, kettling results in the violation of the constitutional rights of peaceful protesters and other innocent bystanders, who are often swept up by police in their attempt to “control” the crowd. Rather than identify and single out the few bad actors, if any, officers engaged in kettling indiscriminately target individuals in a general vicinity and subject them to

the same antagonistic and even violent treatment, regardless of their individual conduct or participation in the protest. Kettling therefore infringes on individuals' First Amendment, Fourth Amendment, and Fourteenth Amendment rights, as protesters and other bystanders are wrongfully detained, arrested, and/or subjected to unreasonable searches, seizures, and excessive force while exercising their constitutional rights.

34. In the immediate days after Mr. Floyd's death, federal courts in several cities, including Portland, Denver, and Oakland began issuing injunctive relief to prohibit law enforcement agencies from using so-called "less lethal" crowd control tactics on peaceful protesters, such as rubber bullets and tear gas.

35. The first Dallas protest in the aftermath of Mr. Floyd's death was on May 29, 2020. On that day, and for hundreds of days after, peaceful protestors gathered in downtown Dallas to demonstrate against police brutality and racial inequality. Although a small minority of individuals present at the scene of the first weekend of protests engaged in destructive activity, including property destruction, those individuals' behavior was profoundly overshadowed by the thousands of otherwise non-violent, non-threatening demonstrators who peaceably exercised their First Amendment rights.

36. Nonetheless, during the 2020 Protests, DPD and other law enforcement departments working with them and/or at DPD's direction (and invited by DPD and Former Chief Hall) directed extreme riot control tactics towards entire groups of protesters posing no harm to officers or anyone else. Dressed in riot gear and driving armored vehicles, DPD and those working with them kettled protestors, deployed riot control devices against ordinary citizens and journalists alike, without regard to whether the circumstances justified it, and shot "less lethal" weaponry at peaceful citizens.

37. During the first seven days of demonstrations in Dallas, DPD Officers and those

working with them, including but not limited to the Sheriff's Deputies and State Troopers, and Federal Agents repeatedly used extreme and lethal force against crowds, directly targeting peaceful, non-threatening protestors with KIPs, tear gas, smoke bombs, and other riot control devices that the City of Dallas and Chief Hall praise as "less lethal." In particular, DPD and those working with them and/or at their direction used pepper balls and a type of KIP called 40mm eXact iMpact extended range "sponge" bullets—often referred to as "rubber bullets"—against protestors, bystanders, and journalists in order to suppress their First Amendment rights, without regard to constitutional limits.

38. Chief Hall defended her decision and orders to shoot protestors with tear gas—a chemical weapon banned in war—during the 2020 Protests in Dallas. Hundreds of reports of peaceful protestors, journalists covering protests, and bystanders bleeding and suffering from unwarranted levels of force employed by law enforcement threaten to chill participation in ongoing demonstrations in Dallas.

39. When DPD Officers and those working with them could not keep protestors moving in the direction they wanted, they called for additional officers with KIPs or tear gas in order to kettle protestors or alter their direction of travel. DPD Officers and those working with them regularly called for the use of tear gas to control the direction in which protestors were traveling. DPD Officers and those working with them often reported they could not kettle protestors exercising their First Amendment rights without the use of gas. DPD Officers and those working with them specifically used tear gas for the specific purpose of kettling crowds that were not apparently posing any direct or imminent threat.

40. DPD Officers and those working with them were instructed to rush into crowds that were simply moving down the street in order to prevent them from continuing their protests.

DPD Officers specifically reported that pepper ball rounds worked “very well” to disburse protestors who were “agitated” but not apparently posing any threat.

41. Upon information and belief, during the course of the 2020 Protests and specifically during the May 30, and June 1, 2020 protests in which Plaintiffs participated, Sheriff Deputy Defendants fired tear gas into crowds of protestors exercising their First Amendment rights when they did not pose a direct threat to any officers or property.

42. Based on the DPD’s After Action Report on the George Floyd Protest, several other law enforcement agencies played an active role in the events taking place on May 30, 2020 to June 1, 2020. On information and belief, Sheriff Deputy Defendants and State Trooper Defendants (and others) also engaged in the challenged behavior, specifically kettling and shooting Plaintiffs with rubber bullet KIPs without provocation or justification, which violated their constitutional rights and resulted in injuries to one or more of the Plaintiffs.

43. Plaintiffs and other non-threatening people present at the first weekend of 2020 Protests in Dallas from May 30 to June 1, 2020, suffered and continue to suffer from injuries caused by Defendants.

### **The Bridge Incident**

44. On Monday, June 1, 2020, all Plaintiffs gathered for a peaceful protest in front of Lew Sterrett Justice Center to exercise their First Amendment rights and voice their concerns regarding recent instances of police brutality.

45. After the rally at Lew Sterrett Plaintiffs began marching. While marching down Riverfront Drive, DPD directed protestors, including Plaintiffs, onto Margaret Hunt Hill Bridge. DPD had stopped traffic to allow Plaintiffs and other protesters to enter the bridge.

46. Plaintiffs were met at the on the east end of the bridge by a line of officers.

Upon meeting the officers at the east end of the bridge, protestors stopped and peacefully stood while chanting.

47. Without provocation, officers and/or deputies began to fire smoke canisters and other KIPs towards Plaintiffs and other individuals on the bridge. To avoid being seriously injured, Plaintiffs turned away from the officers and/or deputies firing towards them and tried to leave the bridge from the direction which they had entered.

48. Upon trying to vacate the bridge the protestors were met with another line of law enforcement officers that blocked their exit from the bridge.

49. The law enforcement officers had kettled Plaintiffs on the bridge. They began to tell the protestors to get on the ground and advised that they were all being arrested and began to zip tie the protestors who were laying down on their stomachs flat on the ground.

44. At no point did they pose an immediate threat of serious harm, or threat of any kind, to the officers, troopers, and/or deputies who fired at them.

45. DPD Officers, Sheriff's Deputies, and State Troopers would eventually detain approximately 674 protesters on the Bridge at the end of the march from the Frank Crowley Courts Building downtown that was, by all accounts, entirely peaceful. Video footage taken by march participants and journalists confirms that the only violence on the Bridge came from DPD Officers, Sheriff's Deputies, and State Troopers who fired so-called "less lethal" rubber bullets, along with pepper balls, smoke bombs, and tear gas, at nonthreatening, kneeling demonstrators who had been kettled by police. Assessing the incident the next day, Chief Hall said, "I strongly believe we made the right decisions to deter and disperse the large crowd on the bridge."



46. But the DPD Officers Defendants, Sheriff Deputy Defendants, and State Trooper Defendants did *not* “deter” or “disperse” the crowd and instead deliberately *prevented* participants from leaving by kettling them onto the Bridge.

47. When the crowd’s march from downtown reached the intersection with the roadway leading to the Bridge, demonstrators found the westbound ramp onto the Bridge was not blocked by police, unlike other sides of the intersection. As the group of protesters they were a part of proceeded onto the Bridge, the Plaintiffs never received an instruction not to go on to the Bridge or warning that they would be arrested or detained for doing so. Protesters and journalists on the scene say they were told by law enforcement to “continue moving” but were never warned not to walk up the ramp to the Bridge.

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48. The conduct of DPD Officers, the Sheriff’s Deputies, and State Troopers, particularly toward peaceful protestors, shows that Defendants are present at protests not simply to prevent property damage and keep the public safe but rather to retaliate against citizens for exercising their constitutional rights. Indeed, DPD Officers, Sheriff’s Deputies, and State Troopers and those working with them were and are dressed and armed to use violence against protestors, demonstrators, and bystanders. It is evident through their militaristic, indiscriminately violent conduct toward peaceful protestors, bystanders, press—and as widely captured on video—that Defendants were not present to serve a public safety role, but instead to dominate the protestors.

49. Against this backdrop, immediate federal intervention was and continues to be necessary to enjoin the unconstitutional use of excessive force and kettling techniques against peaceful

protests.

**2. The City of Dallas uses KIPs and other “less lethal” force in a deadly manner—even when it violates the City of Dallas’s own written policies and the U.S. Constitution.**

64. KIPs—often called “rubber,” “sponge,” or “foam” bullets—describe a category of ammunition used commonly in crowd-control settings, and include pepper balls.<sup>31</sup> Some KIPs are made of hardened foam or plastic, often containing a rigid or metal core. Others are “beanbag” type rounds, and others may be composed of rubber or wood.











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0 වන 0033 002 වන 650010 වන යනු යනුයේ යනුයේ 0  
වන 7960 වන 0 වන 0 වන 00905 වන 7960 වන 0090 4964 යනු  
00 වන 005 වන 1010 වන 7960 වන 00 වන 15 වන 605 වන 06 වන 0 වන  
වන 005 6 වන 003300 යනු 0 වන 0033 9 වන 0094  
වන 0 වන 005 6 වන 003300 6 වන 003300 1539000  
වන 7630 වන 0 යනු 7960 වන 6 වන 1005 වන 4 වන 002  
වන 760 වන 00335 වන 35 වන 6440 යනුයේ 00 565  
00 වන 005 වන 7 වන 13 7960 වන 0090 යනු යනු 4  
වන 6 වන 050040 වන 0065 යනු 650063 යනු 06  
7962 වන 0 වන 006 වන 302 වන 0 වන 6440 යනු 0035  
4964 වන 4 වන 0090 වන 009 වන 650000100653 90 වන  
00 වන





ක6369, ✓1ආ30ක 6109යැර 62ක 0න 15ක  
 90රැර 05ක0රැර50 796470රැර 3333 9  
 00රැර50 06 රැර4ය5ර 90ර 3331 9ක00ර5ය00  
 65, 0න 4ය66 90ක 655065 ය02රැර 9  
 90න 3613ර 561 0ය5 0න 1ක2 00670 05 0  
 9 3333 ✓630ක 7904ර50 33 9730  
 9 10 00670 300 4, 6949 9 33 9  
 33 9 560 9කය50රැර 9 00ය0ර4ර50 රැර  
 5ර05 6ර0ක901 යක00650 ය0 0න 90රැර 1  
 5ර9 0න 100 6 7960ක05? 7960ක0  
 90 964 2න0ක13ය9 051195 65 ය 96යර3ය5 00  
 033 67ර5 06 09යර0ක, 3305ර35 යර09  
 99ක005 7960ක0690 65 0න 90රැර 7197  
 690රැර35 69 6ක091ක005 ය 90ර3ය5 69 69  
 2063ය005 0න 19ර3 69ර05ය5ක 7960ක0  
 90 3ක9 560 ක3රැර 35 0න5 3ක9 05  
 99ක00රැර 6949 90ර 33 ර6677රැර ය33  
 90ර9ර0•10 6535 යර09 රැර465009ය0690 3ක9  
 9 01කක00ර1335 050040රැර0රැර ය5ර රැර0ක99රැර  
 964 4ක9ක0005 0න09 0900 4ර5ර4ර50 9  
 0ර00 ය5ර 6535 යර09 ✓3ය0500ර0 ය5ර 15ර  
 9ර0 6 60න90 3ක9 15ක65000010065ය335 0  
 06රැර 9ර3ර ය5ර 05119ර 5 9ර5ර5ර500

[illegible]













ආපදා මධ්‍යස්ථානවල සිටින අයට අනුරූපව ප්‍රතිපත්තිමය ක්‍රියාමාර්ගයක්  
01 නිවැරදිව පෙන්වා දීමට හැකි වන තරම් තොරතුරු සැපයීමට අපට  
69 ලක්ෂ්‍ය 93040005 දේ 7630 නිවැරදිව 10 ලක්ෂ්‍ය 0 ලක්ෂ්‍ය 9 දේ  
91 නිවැරදිව 133 ලක්ෂ්‍ය 0 දේ 7960 ලක්ෂ්‍ය 0000 පිටුපසින් පිටුපසින්  
යුද්ධයේදී පිටුපසින් පිටුපසින් පිටුපසින් පිටුපසින් පිටුපසින්  
10 ලක්ෂ්‍ය 1 ලක්ෂ්‍ය 0 දේ 1 ලක්ෂ්‍ය 3 ලක්ෂ්‍ය 0 දේ පිටුපසින් පිටුපසින්  
2024710 ✓630 නිවැරදිව ✓9606 නිවැරදිව 469







[illegible]



93.    ×765    05↵694↵0065    ↵5↵    8↵30↵↵    06    ↵↵

0↵↵    5↵00↵↵9    0↵↵    ↵↵33↵10    ↵61505    ↵↵↵5↵↵5010

569    0↵↵    ×0↵0↵    6↵    ×↵4↵10    ↵↵↵5↵↵5010    ↵↵2↵

0↵9405↵0↵↵    ↵55    6↵    0↵↵    ↵6↵5    ↵5↵    ↵↵5↵    ×40

0↵    ×↵↵90↵↵110    ↵↵7100↵10    69    0↵↵    ↵6↵5    ↵5↵    ↵↵

5↵    ↵↵00↵    ×0↵0↵    ×9667↵910    79↵10↵50    69    36920

5↵    ↵1905↵    0↵↵    □□□    ✓960↵10010↵    569    ↵↵2↵    0↵↵

5    9↵8109↵↵    0↵↵0    0↵↵10↵    ↵↵7100↵10    69    ×9667↵

910    8↵    ↵010↵07305↵↵    ↵↵2↵    ↵↵↵00065↵3    1017↵9

2010065↵    69    15↵↵9↵6    ↵↵↵00065↵3    09↵0505↵↵

↵5    ↵605↵    106↵    0↵↵    ×↵↵90↵↵    ↵9635↵    ↵✓×↵    ↵5↵

↵✓×    ↵09↵↵069    ×0↵2↵5    ↵↵    1↵↵9↵3    9↵00↵0↵↵

↵5↵    0↵↵0035    ↵77962↵↵    6↵    0↵↵09    865↵1↵0↵

VII.              

[illegible]

94. ✓③㉟⑤①①㊦⑩    ㄹ⑤    ⑨ㄴㄴㄴㄴㄴㄵㄶㄷ    ①⑤ㄺ⑥⑨⑦⑥⑨㉟  
 ㄴ    ㉟⑤ㄴ    ⑨ㄴ㉟③③ㄴㄹㄴ    ㉟③③    ⑥ㄴ    ①ㄱㄴ    ⑦⑨ㄴㄻㄴㄴ①⑤ㄹ    ⑦㉟⑨  
 ㉟ㄹ⑨㉟⑦ㄱ⑩    ㉟⑩    ①ㄱ⑥①ㄹㄱ    ㄴ①③③⑤    ⑩①㉟①ㄴㄴ    ㄱㄴ⑨ㄴ①⑤

95. ✓ ③ ㄱ ⑤ ① ① ㄴ ㄴ ⑩ ㄴ ⑤ ㄹ ㄱ ㄹ ㄴ ㄹ ⑤ ㄴ ⑥ ⑤ ⑩ ① ① ① ① ① ① ⑥ ⑤  
 ㄱ ③ ③ ⑤ ⑦ ⑨ ⑥ ① ㄴ ㄴ ① ㄴ ㄹ ㄱ ㄴ ① ⑩ ⑥ ㄴ ⑥ ㄴ ⑩ ㄴ ⑨ ② ① ⑤ ㄹ ㄹ ⑨ ㄴ ㄴ ⑥ ⑨ ㄹ  
 ① ⑤ ㄹ ㄹ ⑥ ⑨ ⑦ ㄱ ⑨ ① ① ㄴ ① ⑦ ㄱ ① ① ⑤ ㄹ ① ⑤ ㄴ ② ㄴ ⑤ ① ⑩ ⑥ ㄴ ⑦ ① ㄴ ③ ①  
 ㄴ ① ⑤ ① ㄴ ⑨ ㄴ ⑩ ① ㄹ ① ⑤ ㄴ ③ ① ㄹ ① ⑤ ㄹ ⑦ ① ㄴ ③ ① ㄴ ㄹ ㄴ ④ ⑥ ⑤ ⑩ ① ⑨ ㄱ ① ①

6510 ය5ල 47910005 09 763000න3 20310  
✓3ය0500න10 3033 න650051 06 ල6 06 05 0  
9 1019

96. 5 6949 09 33 ය4000  
09 09 253 310 3093 ය441500065  
3ය10 05 10ල ය50500 79න13 79601006  
90 36 39 560 0990505 06 න64400 79  
67905 ය44 69 75100න3 20635න 10 9  
5න619යල ය5ල ලන5ල 09 79න00න 10  
ය10 00 ල007910 09 න96310

97. 09 යන00650 6 09 005 6 33ය10  
95010 09 01779100065 6 ය 79න13  
13 ල465009ය0065 ය5ල 09 20376050 00 9  
79105095 09 යන00650 6 09 33  
05 69ල905 01න 01779100065 7902 3ය  
0500න10 6 09 90900 15ල9 09 0900  
45ල450 06 09 65000010065 06 9  
ල64 6 079න 9ල64 6 ය100435 ය5  
ල 9ල64 06 7000065 096295450 69  
ය 9ල910 6 902ය5න10 09 005 6 33  
33ය10 95010 ල3099035 2063ය0ල 3  
331003009 7960න00650 69 09 49  
න010 6 079න ය5ල ය100435 05 7130න 7  
3න10

98. ☒ 005 6 0333 0 0500 9 03030 0500 ✓ 030500 6 69 050505 05 06500010065335 7960000 02005 05 69 0 0650050 05 200376050 6 000 9 0479000650 ☒ 005 6 0333 0 0500 03030065 0 7 00 6 03 700095 69 790000 6 150650000 1006503 06500 0 0 00035 302035 06 0650051 050 90000

99. ☒ 005 6 0333 0 0500 20 63050 0650 309 560 03 9065030 901 30065 6 0 004 7300 69 40550 6 ✓ 030500 000 0900 40504050 7960000 02005 ☒ 000 0650 309 560 1100000 05 03 047033050 69 020 1100003006209 54050 0500900 110000505 0 050905040 50 6 ✓ 030500 000 0900 40504050 90000 ☒ 205 00014050 09010506 000 0090 05 03 047033050 0620954050 0500900 0 5 796000050 050500 79670905 04050 69 0309050 1009000 6 7960000690 0 005 6 0333 0 0500 030300650 063090 ✓ 03 050000 05 0 096170 6 796000090 30 9 560 50996335 0036900 06 10920 000 0620954050 0500900 05 03 30313 405509 ☒

100. ✓3ෂ0500ෂෂ0 9ෂෂ065ෂෂ35 ෂෂෂ9 0ෂෂ ෂ6  
 50051ෂෂ 05ෂ00ෂෂ90405ෂ0ෂ 10ෂ 6ෂ ෂෂ✓0 ෂ5ෂ ෂෂ  
 73654ෂ50 6ෂ ෂෂෂ40ෂෂ3 ෂෂෂ500 ෂ5 ෂෂෂෂ5ෂෂ5  
 00 300ෂ610 3ෂ9505ෂෂ ✓3ෂ0500ෂෂ0 ෂ190ෂෂ9 9  
 ෂෂෂ065ෂෂ35 ෂෂෂ9 153ෂෂෂ13 0ෂ0619ෂ ෂ5ෂ ෂ4ෂ  
 ෂෂෂ02ෂ ෂ69ෂෂ 0ෂ961ෂෂ 0ෂෂ ෂ0905ෂ 6ෂ ෂ3ෂ0  
 ෂ ෂෂෂෂෂ ෂ9ෂ5ෂෂෂෂෂෂ ෂෂ✓0 ෂ5ෂ 60ෂෂ9 7961ෂෂ003  
 ෂෂෂ ෂ5ෂ 60ෂෂ9 4ෂෂ50 0ෂ ✓3ෂ0500ෂෂ0 ෂ5ෂ 79  
 60ෂෂ0ෂ90 ෂ650051ෂ 06 ෂ5ෂෂෂෂ 05 ෂ65ෂ00010  
 065ෂ335 7960ෂෂෂෂෂ ෂෂෂ002005ෂෂ

101. ෂෂෂෂෂ ෂෂෂ00 3613ෂෂ ෂෂෂෂෂ ෂ 9ෂෂ065ෂෂ  
 3ෂ 7ෂ9065 ෂ964 ෂ65005105ෂ 06 ෂ5ෂෂෂෂ 05 ෂ  
 ෂ65ෂ00010065ෂ335 7960ෂෂෂෂෂ ෂෂෂ002005ෂෂ ෂෂ  
 ෂෂෂ ෂෂෂ00 ෂෂෂෂ 05 ෂෂෂෂෂෂ ෂෂෂෂෂ ✓3ෂ0500ෂෂ0  
 ෂ964 ෂ65005105ෂ 06 6ෂෂෂ92ෂ ෂ5ෂ 9ෂෂ69ෂ 06  
 4ෂ ෂ2ෂ500 6ෂ 71ෂ30ෂ 050ෂ9ෂෂ0 ෂ5ෂ 06 7ෂ90  
 0ෂෂ7ෂෂෂ 05 7ෂෂෂෂෂෂ13 7960ෂෂෂෂෂෂෂ ෂෂෂ ෂෂෂෂ 6  
 ෂ ෂෂෂෂෂෂ ෂෂෂෂෂෂෂෂෂෂ ෂෂෂෂෂෂ 300ෂ 9ෂෂ23ෂෂෂ  
 69 ෂෂෂ33610 05ෂ0ෂෂෂ9ෂෂෂෂෂ 06 0ෂෂ ෂ65ෂ0001  
 0065ෂ335 7960ෂෂෂෂෂෂෂ 90ෂෂෂ00 6ෂ ✓3ෂ0500ෂෂ0ෂෂෂෂෂ

102. 00 0000 0000 0000 00 00000000 000000000000  
 000000 00000000 0000 00000000 00000000 0000 0000 0000 0000  
 0000 00 00000000 00000000000000 000000000000 00 0000  
 00 0000 000000000000 0000 000000000000 0000 00000000  
 000000000000 0000000000000000 00000000 00000000000000  
 000000 000000000000 00 00000000 000000 000000000000 0000  
 000000 000000000000 0000000000000000000000

103. 0000 0000 00 00000000 00000000000000 00  
 000000000000 000000000000 00 000000000000 0000 00000000 00000000 0000  
 000000000000 00000000 000000000000 0000 0000 00000000 00000000 0000  
 000000000000 000000000000 00 0000000000000000000000 0000  
 000000000000 000000000000 0000000000000000000000 0000  
 000000000000 0000000000000000000000 000000000000 000000000000 0000  
 0000000000000000000000

104. 0000 00000000 00 0000000000 00000000000000000000  
 0000 000000000000000000000000000000000000 000000000000 000000000000  
 000000 000000000000000000000000000000000000 0000000000000000000000  
 000000000000 000  
 00  
 00  
 00  
 00

105. 0000000000 00000000 0000 000000000000 0000000000  
 000000000000 000  
 000000000000 000  
 000000000000 000  
 00  
 00  
 00





[illegible]

06150 0000 00203 000000 0  
3004 0000 000000 0 000000  
0000000000 000000  
000300065 00 000000 0000  
0000000000 0000000000 000000  
000000 00000000 00000000  
00 0000000000

[illegible]

111.    0   33   004210   332222   229205    ✓  x

0229   222523010   3292   103695   763022   6

022910   3002   022    ✓  352   320052   15229   2636

9   6   333

112.    0   33   933250   00410   332222   29  
 205   56   00625   66029   69   5100529   3  
 310   05   0440520   229   69   0209   302   69   05  
 229   62   02   3350022   2110052   024   102  
 906110   26235   051195

113.  ①  ③ ③  ⑨  ③  ②  ⑤ ①  ① ① ④  ⑩  ③ ③      ⑨




































































10922 6600000000 06 00000000 70000000 66 0000  
7000000000 00000000

3009610 නිලධාරීන්ගේ යන 67769015005 කෙරෙහි 05නිල  
ලිපිනය නිවෙස් 0965030065   1003030 090 00  
10 6600නිල 0303030 නිවෙස් 05610 06 නිලධාරීන්  
ලිපිනය 0065  3009610 නිලධාරීන් 106 නිවෙස් 06  
නිලධාරීන් ය 0303030   1003030 40500 03030  
030 090 2095 303000 05නිවෙස් 1000000 03030   
 xකෙරෙහි   050001 යන 00650 65 090   
ලිපිනය 

141.  3900003 යන 153900003 7630නිල  
නිල 66 090  005 66  33030  090306903 යන  
090 46205 කෙරෙහි නිල නිලධාරීන් 090 15නිවෙස් 100001  
006503 1006190 101කෙරෙහි නිල නිල  3030500කෙරෙහි 0  
5 20630065 66 09009  61903  40504050 90  
090 

142.  ය ලිපිනය 0303030 යන 796404030 900130  
66 090   xකෙරෙහි   050001 යන 00 යන  
640000650 3003030 යන 0050 15නිල නිවෙස් 10030  
30303 යන 1003030 යන 06203  3030500කෙරෙහි 30903  
නිවෙස් 66 09009  61903  40504050 900900  
යන 101කෙරෙහි 05119000 යන ලිපිනය 

06150  0203   
00 030304     
  03030 06   
17002000 යන 000007  
30030  
006300065 66  61903 යන  
 61903030  40504050   
09000  05000  05000  
0006 66  33030 යන 090  
නිල 





၆၃ x၉၈၉၁၀ ၆၅၈ ၀၉၉ ၆၅၈၀၀၀၁၀၀၆၅ ၆၅၈၀၀၉၈၉  
 ၆၅၈၀၉၈ ၆၅၈၈၈ ၈၉၀၀၉၈၉

09060600 000 15000000 100 60 0000 0500 00  
 09060600 000 00000000 100 60 000 04415000  
 65 65 7000000000 5650000000000000 796000000  
 9000 000 000000 60 000000 00000000 0500 06 00  
 0000 000 00000000 60 00000000000000 000000 000000  
 4000000000 9000000000 0000000000000000 00000000  
 9000 05000000000000 00000000 000 600000000000  
 0500 9000000000 100 60 00000000

146. 0000 60 00000000 0500 000000 000000  
 0000 2500 60 000 900000 000000000000 0000  
 000 000 44 000000 00000000 0000000000 900000 00  
 6500 960000 0000000000 0000000000000000 0500  
 00000000000000 0000000000 000 000 0000 60 0000  
 000000 0500 000000 000000 00000000 000 000000  
 00000000000000 000 9000000000 000 000 1  
 53000000 100 60 0000000000 5650000000000000  
 50 00000000 79600000000000 000 000000 60 000000  
 000000 05 00000000 000000 00000000 0500 000000  
 000 000000 000000 00000000 000 000000 00000000  
 00000000000000 000 9000000000 000 00000000 000000  
 000 000000 00000000 000 00000000 000 00000000  
 000000 050000 760000000000 00000000

147. 00000000 000 0000 60 00000000 0000 1  
 0000 00000000 05000000 90000000 000000 000000

ඒ යනු 3200 ක් පමණ යනු 0 ක් 005 6 ක් 333333  
0001 ක් ප්‍රතිපත්තිමය x999999 666 3333 330000 ✓  
7777 3333 4444 5555 0000 0000 330000 0000  
0005 6 ක් 333333 යනු 0000 3333 3322 5522  
9 0001 ක් ප්‍රතිපත්තිමය x999999 9999999999 076555  
යනු 666 999999 553333 4444 0022330000 0000  
6 ක් 3333 යනු 0000 0005 6 ක් 333333 99000000 0  
000 6 ක් 447777 3333 4444 99999999 565000  
999000555 7760000699 05 206330065 6 ක් 006  
000 ප්‍රතිපත්තිමය x999999 7765 05669430065 යනු 5  
330000 06 999000 5655 6 ක් 000 444 x999999  
3333333333 3322 5555 00940530000 0000073  
05000 998109000 06 3322 99990006533 007792  
000655 66 998109000 06 1555996 99990006533  
0999999999 000 3333333333 00225 0000 0000  
6 ක් 3333 000 560 0000073055 66 007792000  
2090133333 333 6 ක් 000 444 x99999999 336 10  
000 076555 යනු 666 999999 553333 4444 66 77  
7777 333333 9999999999 ✓3330500000 යනු 60009  
565000999000555 776000000999 00

0000 ✓3330500000 9999999999 0000 444 x99999999  
443205 00330040 333 0094053000 55 444 55  
10 60009 444 x9999999999 යනු 05 7790001333  
000 444 x9999999999 336 05119000 යනු 206330  
000 ✓3330500000 33333300010006533 99999999 339  
0 560 0094053000 0000073055 998109000

06 2 000653 101792010065 69 9810  
9 06 15 96 000653 090505

010 9 9 065 06 05 09 0 05 0 9 5 10  
 6 0 0 05 6 0 33 0 5 0 0 0 0 33 0  
 6 0  
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148. 0  
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149. 0  
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150. 0  
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151. 0

ఆ9న ల09నన035 9న10765100ఋ3న ఁ69 09ఆ0505ల 6  
 5 0ఫన 110న 6ఁ ఁ09నఆ9410 300ఫ 9నలఆ9ల 06 3న  
 0ఫఆ3 ఆ5ల ఆ33నలనల35 3న1010 3న0ఫఆ3 047ఆన0 3  
 నఆ76510ృ 0ఫన 4ఆ55న9 6ఁ 110నృ ల0100ఆ5నన 6ఁ 1  
 10నృ ఆ5ల 110న 6ఁ ఁ69నన న65005114ృ

152    𐌲𐌹𐍃𐌺𐌰    𐌱𐌴𐌸𐌶𐌵    𐌲𐌴𐌽𐌾𐌰    𐌷𐌰𐌹𐌳𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰

𐌲𐌴𐌽𐌾𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰

𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰

𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰    𐌸𐌰𐌼𐌴𐌸𐌶𐌵𐌰𐌿𐌺𐌰

[illegible]

154.    ㄱㅈ㉑ㄴㄱ    ㅍㅅ㉑㉑    ㅅㅅㄴ    ㉑ㅈㅈ    ㄱ㉑㉑㉑    ㉑ㄱ    ㅈㅅ㉑㉑ㅅㅅ

㉑㉑ㄴ㉑    ㉑ㅈㅅ㉑    ㅅㅅ    ㉑ㄱ    ㅁㅁㅁㅇㅅ    ㅈ✓ㅈ    xㄱㄱ㉑ㄴㅈㅅㅅ    ㉑ㅈㅅㅈ

㉑ㅅㅅㅅ    ㅍㅍ✓ㅅ    ㅅㅅ    ㉑ㅈㅈㅈㅈㅅ    ㅈㅅ㉑㉑ㅅ    ㅅㅅ    ㅅ    ㉑ㅈㅅㅅㅅ

㉑ㄱ    ㄴㅅ㉑㉑ㅅ    ㄴㅅㅅ㉑ㅅㅅ    ㄱㅅㅅ    ㅅㅅㅅㅅㅅㅅㅅㅅ    ㉑ㅈㅅㅈㅅ㉑ㅈㅅㅅㅅ    ㉑ㅅㅅ    ㉑ㅈㅅㅅㅅㅅㅅㅅㅅㅅ

㉑ㅈㅅㅅㅅㅅㅅ    ㅅㅅ    ㉑ㅅㅅㅅㅅㅅㅅㅅㅅ    ㉑ㅈ    ㅈ✓ㅈ    ㅍㅈㅅㅈㅅㅅㅅ    xㅅㅅㅈㅅ

ㅅ    ㅅㅅ    ㉑ㅈㅈ    ㅅㅅㅅㅅㅅㅅ    ㄱㅅㅅㅅㅅㅅㅅㅅㅅㅅㅅㅅㅅㅅㅅ    ㄱㅅㅅ    ㄱㅈㅅㅈ    ㅍ

ㅅㅅ    ㅅㅅ    ㉑ㅈㅈ    ㅈㅅㅅㅅㅅㅅ    ㄱ㉑㉑    ㄱㅅㅅㅅㅅㅅㅅ    ㄴㅈㅅㅅㅅㅅ    ㅅㅅㅅㅅㅅㅅㅅ

ㅅㅅㅅㅅ    ㄴㅅㅅㅅ    ㅅㅅ    ㅅㅅ    ㅅㅅ    ㅅㅅ    ㅈ✓ㅈ    xㄱㄱ㉑ㄴㅈㅅㅅ    ㅅㅈ

ㅅㅅㅅㅅㅅㅅ    ㉑ㅈㅈ    ㉑ㅈㅅㅈㅅ    ㉑ㅈㅅㅅ    ㅅㅈㅈㅅ    ㅅㅈㅈㅅ    ㅅㅅㅅㅅㅅㅅ    ㉑ㅅ    ㅅ

ㅅㅅㅅㅅㅅ    ㅅㅅ    ㅅㅅㅅㅅ    ㅅㅅㅅㅅㅅ    ㅅㅅㅅㅅ    ㅅㅅㅅㅅ    ㅅㅅㅅㅅ    ㅅㅅ    ㅅ

09 7777 8330 69 609 4/10 050500 0  
 963 30005 650000100653 304000 65 0  
 10 6 69 500 033 190  
 0 06906 009 10 05 06906  
 0 190 10 6 01 441500065 063  
 0 777777 5650090505 796000690  
 0 4050 6 963 65 06 00  
 0 0 40900 6 3050000 10900 405  
 4050 90000 00 650000100 0300900  
 050000905 05 61090610 05 9023  
 00 10 6 69 00

155. 00 005 6 03300 0 03300 0  
 05 615003 05 000 033 306 2503 6 0  
 0 90020 006000 300 0 44 000  
 0 0700 400500 90500 076500 961500 05  
 031005 050700000065 05 0005000050  
 051195 10 0 005 6 03300 05 000  
 033 306 0300 06 0905 6000900 05 0  
 0 0900 30203 50000095 06 1100005 100  
 5 0 076500 1330 4/10 050500 9630  
 30005 0 650000100653 304000 65 0  
 10 6 69 00 005 6 03300 05 000  
 0 033 306 0300 06 0905 6000900 0  
 6 10 4/10 05 405500 15302035 06 0100 0  
 90610 0511900 05 0000

156.    ㄹ2ㄴ5    ㅁㄴ0ㄴ9    0ㅁㄴ    ㅁㄴ10ㄴ10    6ㄴ    7ㄴ77ㄴ9    ㄴ

ㅁ33    ㄱㅍ✓10    05    ㄱㄱㅍㅍ    ㅁㅁ0ㄴ    ㅁㅁ33    0ㅁㄴ    ㅁ005    6ㄴ

ㅁㅁ33ㅁ10    ㅁ5ㄴ    0ㅁㄴ    ㅁㅁ33ㅁ10    ㅁ005    ㅁ615ㄴ03    9ㅁ00ㄴ

0ㄴㄴ    0ㅁㄴ    10ㄴ    6ㄴ    7ㄴ77ㄴ9    ㄴㅁ33    ㄱㅍ✓10    ㅁㅁㅁ05100

565ㅁ0ㅁ9ㄴㅁ0ㄴ505ㅁ    7960ㄴ1006910    05    2063ㅁ0065    6

ㄴ    ㅁ7730ㄴㅁㄴ3ㄴ    ㅁ✓ㅁ    ㅍㄴ5ㄴ9ㅁ3    x9ㄴㄴ910    ㅁ5ㄴ    0ㅁㄴ

ㅁㅁㅁㅁ    ㅁ651000010065ㅁ    ㅁㅁ    ㅁ005    6ㄴ    ㅁㅁ33ㅁ10    0ㅁ

ㄴ    ㅁㅁ33ㅁ10    ㅁ005    ㅁ615ㄴ03    ㅁ5ㄴ    ㅁㅁ0ㄴ    ㅁㅁ33    ㅁㄴ

01ㅁ335    25ㄴ3    69    10ㅁ613ㄴ    ㅁㅁ2ㄴ    25635    0ㅁㅁ0    0ㅁ

ㄴ09    ㅁ7796ㅁㄴㅁ    ㅁㅁ10    ㄴㅁ03ㄴㄴ    06    79ㄴ2ㄴ50    15ㄴ65

1000010065ㅁ3    ㄴ65ㄴ1ㄴ0    ㄴ5    ㅁ✓ㅁ    xㄴㄴ0ㄴㄴ910ㅁ    ㅁㅁ    ㅁ005    6ㄴ    ㅁㅁ33ㅁ10    0ㅁㄴ    ㅁㅁ33ㅁ10    ㅁ005    ㅁ615ㄴ03

ㅁ    ㅁ5ㄴ    ㅁㅁ0ㄴ    ㅁㅁ3310    ㄴ650051ㄴㄴ    ㅁ77962ㅁ3    6ㄴ

11005ㅁ    ㄱㅍ✓10    05    2063ㅁ0065    6ㄴ    ㅁ✓ㅁ    ㅍㄴ5ㄴ9ㅁ3    x9

ㄴㄴ910    ㅁ5ㄴ    0ㅁㄴ    ㅁㅁㅁㅁ    ㅁ651000010065    ㄴㄴ4651009ㅁ

0ㄴ10    0ㅁㄴ    ㄴ6510ㄴ06110    ㄴ0109ㄴㅁㅁ9ㄴ    0ㅁㄴ    ㅁ005    6ㄴ

ㅁㅁ33ㅁ10    ㅁ5ㄴ    ㅁㅁ0ㄴ    ㅁㅁ33    ㅁㅁ2ㄴ    ㄴ69    0ㅁㄴ    ㄴ65

10ㄴ81ㄴ5ㄴㄴ10    6ㄴ    0ㅁㄴ09    ㅁㄴ006510ㅁ

[illegible]



၈၁၀၃၅၀ ၁၀၁၈၃ ၀၉၄၀၅၀၅၅၅ ၀၀ ၃၄၁၀ ၃၀၃၃၃၃၅ ၇၉၃၃၀

၈၀၄၃၃၃ ၀၃၄၀

✎✓✎ x-ክክ0ክክ910 3613ረ ክ650051ክ 06 2063ሄ0ክ ✓3  
 ሄ0500ክክ101 ሄ5ረ 60ኃክ9 7960ክ100ክ9101 ክ65100001  
 0065ሄ3 90ሂኃ010📄 ➡ክክ69ረ05ሂ35📄 0ኃክ ☞005 6ክ  
 ✎ሄ33ሄ10📄 0ኃክ ✎ሄ33ሄ10 ☞005 ☞615ክ03📄 ሄ5ረ ☞ኃ0  
 ክክ ⚡ሄ33 3ክ9ክ ረክ30ክክ9ሄ0ክ35 05ረ0ክክክ9ክ50 06  
 0ኃክ ክ6473ክ0ክ 3ሄክ2 6ክ 09ሄ0505ሂ📄 69 ክ6473  
 ክ0ክ35 05ሄረክ81ሄ0ክ 09ሄ0505ሂ📄 0ኃክ5 ኃሄ2ክ ሂ02  
 ክ5 ✎✓✎ x-ክክ0ክክ910📄

[illegible]

159.    ⑩       ⑩⑨③⑩④       ⑤⑤⑤    ⑦⑨⑥④④④⑤④③    ⑨③⑩①③④

⑥③    ④③③    ④④⑤    ⑥③    ⑤③③⑤⑩       ⑤⑤⑤    ③④④③③    ⑤③③①⑩   

⑩④⑩       ⑥④④⑩⑩④⑤⑤⑩    ③③④③③    ④④⑤⑤    ①⑤⑤③⑨    ⑩⑥③

⑥⑨    ⑩④⑤④③    ③⑤③       ⑩④⑤④③⑤    ⑥②③    ✓③⑤④⑤④④③⑩

③③⑨③    ⑦⑨④②③⑤    ⑥③    ④③④④④    ⑥①⑨④③       ⑥①⑨④

③③⑤④③    ④③⑤⑤④③⑤④    ⑨④⑤③④④       ⑩①③③③⑨③⑤    ④⑤①


①⑨④③⑩       ④⑤⑤③④③④③④③④

၀၆၀၁၅၀ မိမိ ✓၁၉၄၄၅၅  
 ၁၅၀ ၂၅၀၁၅၅၈၀၀၀၂၁ ✓  
 ၁၃၀၁၈၈ ၁၃၅၀၅၀၀ ၀  
 ၁၁ ၀၀၀၆ ၆၈ ၁၃၃၃  
 ၄၀၀ ၁၈၈၈၅၅၅၅၀၀

160.    ✓ ③ ㄱ ⑤ ㄴ ① ㄷ ㄴ ㄴ ⑩    ⑨ ㄹ ㄱ ③ ③ ㄹ ㄹ ㄹ    ㄱ ⑤ ㄴ    ① ⑤ ㄴ ⑥ ⑨ ⑦ ⑥ ⑨ ㄱ ①  
          ㄹ    ㄴ ⑤    ⑨ ㄹ ㄴ ㄹ ⑨ ㄹ ⑤ ㄴ ㄹ    ① ㄹ ㄹ    ㄱ ③ ③ ㄹ ㄹ ㄱ ① ① ⑥ ⑤ ⑩    ㄴ ⑥ ⑤ ① ㄱ ① ⑤ ㄹ

[illegible]

161.   0 0 6 5  3 3 5   5  0 5 0   3 0  9 5  0 0

    3  0 5 0 0   10   9   5 0 0 0 3   0 6 7   9 4   5  5 0

0 5 1  5  0 0  2   9   3 0     5 0 5 10 0 0   0 5 6   0 0 5 6  

 3 3  10     5   5 0 10 

[illegible]

163.   005 6   33  5  5001 0  5

000  306 0010  5  50051  06 0010  5

000  7  9  3  5  94 15  9 0  6190  4  5

4  50  0 00 3  33  00  5  300  0  1005

00  35  69  0500  5 7  9065 3  6  6  10

560 760  5 044  00  0  9  0 6  90610

5  94 2063  0  0  906510  6190  4  5

50 90  0 06  9  64  4  1002  69

00  005 3  7650 0  0  30  61  33  00

35  300 3  0  5  0  5 009  94 9615  0  9

565  0  3  10033 3  0  3  500010  4

10002  69  3  5 10  05  7673  3

6 760  56 044  00  0  9  0 6  90610

5  0 0  4  3  0500  5  60  9 79

60  0  90  50  5  79  10 3033 0650

051  06  4  1002  35  69  153

100 0  005 6  33  5  500  5  0

610  369205  00  4  9  51605  964

1005  1  3  7650  0500 7673  3  7

610  56 044  00

[illegible]

92054 3009 0994 9929 919399 99500099 69  
 0999 999 999 94629 90 950099 996999 69  
 799999913 7960990999 999 059009904059093  
 5 909999 999 90 0590209193 7960990999 560  
 05263299 05 995 9659190 0990 760999 99 0  
 44990909 0999990 69 9990610 9994 90 099  
 00499 999 109 69 9199 9499990029 999935  
 96999 00 560 9999999335 090369999 999 599  
 999995 969 2997054 969999950 93999 69 969  
 7992950054 79679905 999009190065•5900999  
 69 990999 999 9647933054 999109 099 9005  
 69 9993399 9999999950001 76309099 999 79990  
 0999 96 560 9192029 909090 99910055 999 9190  
 9999 900599 099 9005 69 9993399 999999995000  
 1 96999 00 90999099 98199935 90 91779990  
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 49994950 999999640 999 4699 0995 5999999  
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170. As to each of the above causes of action, by the facts set out herein, Defendants, in whole or part, conspired with each other to (a) deprive, either directly or indirectly, Plaintiffs (and other protesters) of the equal protection of the laws, and of equal privileges and immunities under the laws; or (b) hinder others from giving or securing equal protection of law to all persons in violation of 42 USC § 1985(3).

171. The City of Dallas Defendants, the Dallas County Defendants, and the State of Texas Defendants conspired (1) across separate law enforcement departments and (2) between local police (DPD Officer Defendants), county sheriff's deputies (Sheriff Deputy Defendants), and state police (State Trooper Defendants) to deprive Plaintiffs of the equal protection of the laws or to hinder others from giving or securing equal protection to all persons.

172. The DPD After Action Report and photographs taken by Plaintiffs show that Sheriff Deputy Defendants and State Trooper Defendants were present at the protests Plaintiffs attended and that they engaged in the same actions that violated Plaintiffs' constitutional rights as the DPD Officer Defendants.

173. As a direct and proximate result of Defendants' acts in furtherance of their conspiracy while acting under color state law, Plaintiffs were deprived of their Fourth and Fourteenth Amendment rights and suffered injuries and damages.

### **VIII. DAMAGES**

174. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

175. In whole or in part, as a result of some or all of the above actions or omissions of Defendants, Plaintiffs have and continue to suffer irreparable harm as a result of these violations. As a direct and proximate result of Defendants' actions and omissions, Plaintiffs

have suffered and will continue to suffer severe pain of mind and body, emotional distress, physical manifestations

of emotional distress, and humiliation. As a direct and proximate result of Defendants' acts and omissions, Plaintiffs were prevented and will continue to be prevented from participating as activists and peaceful protesters with regard to causes that directly impact their lives and the lives of their friends, families, and communities.

176. As a direct and proximate result of Defendants' actions and omissions, as stated above, Plaintiffs suffered:

- (a) Physical pain and suffering in the past and future;
- (b) Mental anguish in the past and future; and,
- (c) Loss of Enjoyment of life in the past and future.

#### **IX. STATUTORY DAMAGES**

177. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

178. Plaintiffs are entitled to compensatory damages and punitive damages pursuant to 42 USC § 1988.

179. As a direct and proximate result of Defendants' acts and omissions in the foregoing respects, Plaintiffs have been required to retain the services of legal counsel and to incur attorneys' fees and costs thereby.

180. Plaintiffs bring this lawsuit pursuant to 42 U.S.C. § 1983. Plaintiffs are entitled to an award of reasonable attorneys' fees. *See* 42 U.S.C. 1988.

#### **X. PUNITIVE/EXEMPLARY DAMAGES**

181. Plaintiffs reallege and incorporate by reference the allegations contained in the preceding paragraphs.

182. Additionally, and in the alternative, the conduct of DPD Officer Defendants, the

Sheriff Deputy Defendants, and the State Trooper Defendants and those working with them was

done with malice and/or a specific intent by Defendants to cause substantial injury or harm to Plaintiffs. As such, Plaintiffs request punitive and exemplary damages to deter this type of conduct in the future.

183. In the alternative, the DPD Officer Defendants', the Sheriff Deputy Defendants', and the State Trooper Defendants' heedless and reckless disregard of Plaintiffs' rights, safety, and welfare constitutes more than momentary thoughtlessness, inadvertence, or misjudgment. Instead, the DPD Officer Defendants, the Sheriff Deputy Defendants, and the State Trooper Defendants acted with reckless or callous indifference to the federally protected rights, safety, or welfare of others. Defendants had actual, subjective awareness of the risks of injury or illegality involved, but nevertheless proceeded with conscious, reckless, or callous indifference to the rights, safety, or welfare of others, including Plaintiffs. Such unconscionable conduct goes beyond ordinary negligence, and as such Plaintiffs request punitive and exemplary damages are awarded against Defendants in a sum which is within the jurisdictional limits of this court.

## **XI. JURY TRIAL DEMANDED**

184. Plaintiffs assert their rights under the Seventh Amendment to the U.S. Constitution and demands, in accordance with Federal Rule of Civil Procedure 38, a trial by jury on all issues so triable.

## **XII. PRAYER**

185. WHEREFORE, Plaintiffs request this Court and the finder of fact to enter a Judgment in Plaintiffs' favor against all named Defendants on all counts and claims as indicated above in an amount consistent with the proofs of trial, and seeks against Defendants all appropriate damages arising out of law, equity, and fact for each or all of the above counts



where applicable and hereby requests that the trier of fact, be it judge or jury, award Plaintiffs all applicable damages, including but not limited to compensatory, special, exemplary and/or punitive damages, in

whatever amount Plaintiffs are entitled, and all other relief arising out of law, equity, and fact, also including but not limited to:

- (a) Compensatory damages in an amount to be determined as fair and just under the circumstances, by the trier of fact including, but not limited to past and future: pain and suffering, mental anguish, anxiety, humiliation, and embarrassment, violation of Plaintiffs' constitutional rights, loss of social pleasure and enjoyment, and other damages to be proved;
- (b) Statutory compensatory damages and punitive damages pursuant to 42 USC § 1988;
- (c) Statutory attorneys' fees and costs pursuant to 42 USC § 1988;
- (d) Punitive and/or exemplary damages in an amount to be determined as reasonable or just by the trier of fact;
- (e) Reasonable attorney fees, pre-judgment and post-judgment interest, and costs; and
- (f) Other declaratory, equitable, and/or permanent injunctive relief, as appears to be reasonable and just.

Respectfully submitted,

//s/ Kim T. Cole  
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